

Montana Republican Party

1413 Helena Avenue, Helena, Montana 59601 • Phone (406) 442-6469 • Fax (406) 442-3293 • E-mail: ezec@mtgop.org

Senator Ken D. Miller, Chairman
February 17, 2003

Billie Love, Vice Chairman

Nicholas T. Ebinger, Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

RECEIVED
FEDERAL
ELECTION
COMMISSION
2003 FEB 21 4 11:54

Re: Montana Republican State Central Committee 000008086
October Quarterly Report (7/1/02 through 9/30/02)
Dear Mr. Ebinger:

This letter is in response to your letter of February 7, 2003 regarding questions on our report noted above. A copy of your letter is attached for your reference.

Contributions in Excess of \$5,000

The contributions shown under the name Taylor Leadership Committee reflect joint fundraising activity with the Taylor for U.S. Senate campaign. This type of activity is discussed on pages 75 to 77 of the Campaign Guide for Political Party Committees. The entries shown as "memo item" for line 12 report the contributions to the Montana Republican Party from this joint activity.

Transfers Received from the National Republican Senatorial Committee

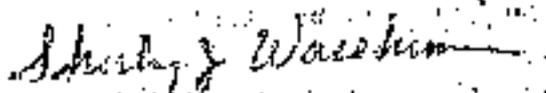
Amounts received from the National Republican Senatorial Committee were not used to purchase bumper stickers or other campaign materials. These transfers were used to purchase issue ads as reported on Schedule H-4.

Bumper Stickers

The expenditure for "bumper stickers" reported on Schedule H-4 was for a bumper sticker reading "Freedom Vote Republican". As this would apply to both federal and state candidates, the expenditure was reported as a joint activity items on Schedule H-4.

If you have questions or need additional information, please advise. We do not believe our report needs to be amended for any of these items.

Very truly yours,


Shirley J. Warchime
State Treasurer



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-5

Shirley J. Warehime, Treasurer
Montana Republican State Central Committee
1419 B Helena Avenue
Helena, MT 59601

FEB 07 2003

Identification Number: C00008086

Reference: October Quarterly Report (7/1/02-9/30/02)

Dear Ms. Warehime:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion(s) attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(f) and 11 CFR §110.1(d) prohibit a committee and its affiliates from receiving any contribution from another political committee or person in excess of \$5,000 per calendar year.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you must amend your original report with the clarifying information.

If any contribution you received exceeds the limits, you may have to refund the excessive amount. The funds can be retained if within 60 days of receipt, (1) the excessive amount was properly reattributed to another person, such as a joint account holder, by obtaining signed written authorizations from each person making the contribution pursuant to 11 CFR 110.1(k)(3), and (2) the treasurer informs the person making the contribution that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution. Any request from a donor for a refund must be honored.

MONTANA REPUBLICAN STATE CENTRAL COMMITTEE
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Alternatively, the funds can be retained if within 60 days of receipt you (1) transferred the excessive amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund. Any request from a donor for a refund must be honored.

If the foregoing conditions for reattributions or transfers to a non-federal account were not met within 60 days of receipt, the excessive amount must be refunded.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for any transfer-out or refund. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution, transfer-out or refund the excessive amount will be taken into consideration.

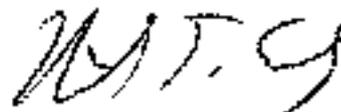
-Schedule A supporting Line 12 discloses a transfer(s)-in from the National Republican Senatorial Committee. Schedule H4 supporting Line 21(a) reflects payments for "bumper stickers." Please be advised that a state or local party committee may pay for campaign materials (such as bumper stickers) that are distributed by volunteers in connection with activity on behalf of the party's nominees in a general election. Payments for this type of activity are exempt from the definition of a contribution or expenditure if certain conditions are met. The conditions are that no public advertising may be used, including distribution by direct mail (mailings by a commercial vendor or from commercial lists); all funds used for the activity must be permitted under the Act; none of the funds used may have been designated for a particular candidate; and finally, payments for the activity may not be made from transfers-in from the national committee to specifically fund the activity. For further guidance, please refer to 11 CFR §100.7(b)(15) and (17) and to the Campaign Guide for Party Committees.

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Please clarify the nature of the transfer(s)-in and subsequent payments for the aforementioned disbursement(s). If the activity disclosed on your report does not meet the definition of "exempt" activity as described above and if any portion of the expenditures were made on behalf of specifically identified candidates, that amount must be disclosed on Schedule B or F supporting Line 23 or 25 of the Detailed Summary Page as appropriate.

Any amendment or clarification should be filed with the Federal Election Commission. Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Nicholas T. Ebinger
Campaign Finance Analyst
Reports Analysis Division

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s)
or each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

PAGE 27 / 81

<input type="checkbox"/> 11a 13	<input type="checkbox"/> 11b 14	<input type="checkbox"/> 11c 15	<input checked="" type="checkbox"/> 12 18	<input type="checkbox"/> 17
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Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)
Montana Republican State Central Committee

NTE

Full Name (Last, First, Middle Initial) Taylor Leadership Committee		Date of Receipt 09 23 2002	
Mailing Address Box 877		Amount of Each Receipt this Period 5479.84	
City Helena	State MT	Zip Code 59524-	Transfers From Affil./Auth. h.
FEC ID number of contributing federal political committee.			
Name of Employer n/a		Occupation n/a	
Receipt For: Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 5479.84	
Transaction ID: 1008200213C108322			

B. Full Name (Last, First, Middle Initial) Dorothy Metz		Date of Receipt 09 25 2002	
Mailing Address 1400 Poly Dr #1000		Amount of Each Receipt this Period 1550.00	
City Billings	State MT	Zip Code 59102-	Transfer Memo (MEMO ITEM) Taylor Leadership Committee
FEC ID number of contributing federal political committee.			
Name of Employer Retired		Occupation retired	
Receipt For: Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 1550.00	
Transaction ID: 1008200213C108322			

C. Full Name (Last, First, Middle Initial) Constance Badner		Date of Receipt 08 08 2002	
Mailing Address 4323 Lake Pl		Amount of Each Receipt this Period 200.00	
City Missoula	State MT	Zip Code 59803-	Transfer Memo (MEMO ITEM) Taylor Leadership Committee
FEC ID number of contributing federal political committee.			
Name of Employer Retired		Occupation retired	
Receipt For: Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 200.00	
Transaction ID: 1008200213C108323			

SUBTOTAL of Receipts This Page (optional)	5479.84
TOTAL This Period (last page info line number only)	

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s)
or each category of the
Detailed Summary Page

FOR LINE NUMBER:		PAGE 30/91	
(check only one)			
<input type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input checked="" type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16 <input type="checkbox"/> 17

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NAME OF COMMITTEE (In Full)
Montana Republican State Central Committee

Full Name (Last, First, Middle Initial) A. Taylor Brown		Date of Receipt 08 07 2002
Mailing Address 507 Pickens Road City Huntley State MT Zip Code 59037-		Amount of Each Receipt this Period 3050.00
FEC ID number of contributing federal political committee.		Transfer Memo [MEMO ITEM] Taylor Leadership Commit- ee
Name of Employer Occupation		Transaction ID: 1008200213C106324
Receipt For: Primary General Other (specify) ▼	Aggregate Year-to-Date ▼ 3050.00	

NTE

Full Name (Last, First, Middle Initial) Taylor Leadership Committee		Date of Receipt 09 30 2002
Mailing Address Box 677 City Helena State MT Zip Code 59624-		Amount of Each Receipt this Period 1604.15
FEC ID number of contributing federal political committee.		Transfers From Affil/Aul- h.
Name of Employer Occupation n/a		Transaction ID: 1008200213C106331
Receipt For: Primary General Other (specify) ▼	Aggregate Year-to-Date ▼ 1604.15	

C.

SUBTOTAL of Receipts This Page (optional)	1604.15
TOTAL This Period (last page line number only)	185757.80

